PROJECT SUMMARY

I. INTRODUCTION

Signode has submitted a construction permit application to add coating operations to its existing Pilot Line. The Pilot Line is used for research and development in the production of steel strapping. The new coating operations, which will involve a Paint Dip Tank and Drying Oven and a Wax Applicator/Dryer, require a permit because they will emit volatile organic material (VOM). Limits have been placed on the proposed equipment restricting the emissions of VOM, which would prevent the project from being a major modification subject to Nonattainment New Source Review, 35 IAC Part 203. The proposed limits would be accompanied by recordkeeping and reporting requirements.

II. SOURCE DESCRIPTION

Signode produces steel strapping for industrial and commercial packaging.

III. EMISSIONS

As described in Attachment 1 of the draft permit, contemporaneous VOM emission increases will be limited to less than 25 tons (less than 25 tons in the last five years). As a result, the project will not be subject to non-attainment NSR. For this purpose, this permit also addresses certain existing units at the source, including the Cold Rolling Mill, which supplies raw steel strap to the Pilot Line.

IV. APPLICABLE EMISSION STANDARDS

All emission sources in Illinois must comply with the Illinois Pollution Control Board's emission standards. The Board's emission standards represent the basic requirements for sources in Illinois. The Board has standards for sources of volatile organic material. The new operations comply with all applicable Board standards.

The new operations are also subject to federal standards under the NSPS and NESHAP for coil coating operations.

V. DRAFT PERMIT

The conditions of the draft permit contain limitations and requirements to assure that this project will be operated so as to not trigger non-attainment NSR. The permit sets limitations on volatile organic material emissions.

The permit conditions also establish appropriate compliance procedures, including inspection practices, recordkeeping requirements, and reporting

requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the facility is operating within the limitations set by the permit and are properly controlling emissions.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the project meets all applicable state and federal air pollution control requirements, subject to the conditions proposed in the draft permit. The Illinois EPA is therefore proposing to issue a construction permit for this project.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public heating in accordance with 35 Ill. Adm. Code Part 166.

CR:RG:04100019:jar